

GAM: 2021R00125
TMS 04/28/25

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

SEAN R. SULLIVAN,

Defendant.

*
* CRIMINAL NO. 23-cr-257-JRR-1
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* (False Statements in Keeping
* Records by a Federal Firearms
* Licensee, 18 U.S.C. § 922(m);
* 924(a)(3); Forfeiture, 18 U.S.C.
* § 924(d) and 28 U.S.C. § 2461(c))
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FILED ENTERED
LOGGED RECEIVED

JUL 28 2025

AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND
BY DEPUTY

SUPERSEDING INFORMATION

COUNTS ONE THROUGH EIGHT

(False Statements in Keeping Records by a Federal Firearms Licensee)

The United States Attorney for the District of Maryland charges that:

On or about the dates set forth below, in the District of Maryland, the defendant, **SEAN R. SULLIVAN**, a licensed dealer of firearms, within the meaning of Chapter 44 of Title 18, United States Code, knowingly made false entries in a record the Defendant was required to keep pursuant to Section 923 of Title 18, United States Code, in violation of Title 18, United States Code, Sections 922(m) and 924(a)(3)(B), to wit:

Count	Date	Document
1	August 9, 2018	ATF Form 6- Submitted to ATF with false law letter relating to one APC40 machinegun and an APC9KSD machinegun.
2	January 27, 2019	ATF Form 6A- Submitted to ATF with false statement indicating two San Swiss SG550P pistols were imported when in fact the firearms were STG90 machineguns.
3	Aug 10, 2019	ATF Form 6- Submitted to ATF with false law letter relating to one FN (Herstal) FN/FAL machinegun.
4	October 7, 2019	ATF Form 6- Submitted to ATF with false dealer sales sample (demonstration) letter relating to one FN (Herstal) MAG58 machinegun.
5	July 19, 2020	ATF Form 6A- Submitted to ATF with statement falsely stating that a H&K G28 "standard length" rifle was imported when in fact the firearm was a H&K MR308 rifle

6	Nov 30, 2019	ATF Form 6- Submitted to ATF with false dealer sales sample (demonstration) letter relating a GIAT Industries FAMAS machinegun.
7	July 19, 2020	ATF Form 6A- Submitted to ATF with false statement indicating that fifteen San Swiss PE90P pistols were imported, with the one having sn 130171 marked as an SG551P when it was actually an SIG 550-1 Sniper Rifle
8	July 22, 2020	ATF Form 6- Submitted to ATF with false dealer sales sample (demonstration) letter relating to two, Glock 18 "Submachineguns", Cal. 9mm; two Glock 18C "Submachineguns", Cal. 9mm; two Glock, G18C Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18 Gen 4, "Submachineguns", Cal. 9mm; two Glock, G18C Gen 5, "Submachineguns", Cal. 9mm; and two Glock, G18 Gen 5, "Submachineguns", Cal. 9mm.

18 U.S.C. § 922(m)

18 U.S.C. § 924(a)(3)

FORFEITURE ALLEGATION

As a result of the violations of Title 18, United States Code, Section 922(m), set forth in Counts One through Eight of this Criminal Information, defendant **SEAN R. SULLIVAN** shall forfeit to the United States of America all firearms involved in the commission of such offenses, including, but not limited to:

1. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424807 (Nforce 96)
2. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424801 (Nforce 117)
3. H&K SP5K, 9mm machinegun bearing SN# 271-005527 (Nforce 124)
4. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424797 (Nforce 132)
5. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424800 (Nforce 133)
6. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424799 (Nforce 134)
7. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424802 (Nforce 135)
8. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424805 (Nforce 137)
9. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424808 (Nforce 138)
10. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424798 (Nforce 141)
11. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424804 (Nforce 142)
12. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424803 (Nforce 143)
13. Swiss Arms AG, SG 553, 5.56cal machinegun bearing SN# 424806 (Nforce 145)
14. Heckler & Koch USC, .45cal rifle bearing SN# 47-018563 (Nforce 146)
15. Heckler & Koch USC, .45cal rifle bearing SN# 47-018559 (Nforce 147)
16. Heckler & Koch USC, .45cal rifle bearing SN# 47-018561 (Nforce 148)
17. Heckler & Koch USC, .45cal rifle bearing SN# 47-018553 (Nforce 149)
18. LWRC International M6, 5.56cal machinegun bearing SN# 03-74342 (Nforce 150)
19. Heckler & Koch USC, .45cal rifle bearing SN# 47-018555 (Nforce 151)

20. Heckler & Koch USC, .45cal rifle bearing SN# 47-018579 (Nforce 152)
21. Heckler & Koch USc, .45cal rifle bearing SN# 47-018560 (Nforce 153)
22. Heckler & Koch USC, .45cal rifle bearing SN# 47-018556 (Nforce 154)
23. Heckler & Koch USC, .45cal rifle bearing SN# 47-018558 (Nforce 155)
24. Heckler & Koch USC, .45cal rifle bearing SN# 47-018554 (Nforce 156)
25. Colt M16A1, 5.56cal machinegun bearing SN# 9384295 (Nforce 157)
26. Heckler & Koch USC, .45cal rifle bearing SN# 47-018562 (Nforce 158)
27. Zastava RPK, 7.62cal machinegun bearing SN# C-43697 (Nforce 159)
28. Heckler & Koch 417, 7.62cal machinegun bearing SN# 89-001391 (Nforce 160)
29. Colt XM16E1/AR15, 5.56cal machinegun bearing SN# 728293 (Nforce 161)
30. Colt M16A2, 5.56cal machinegun bearing SN# 8192205 (Nforce 162)
31. Colt Model 613/AR15, 5.56cal machinegun bearing SN# 4954363 (Nforce 163)
32. Colt M16A4, 5.56cal machinegun bearing SN# 10030193 (Nforce 164)
33. Beretta AR70/90, 5.56cal machinegun bearing SN# A01114G (Nforce 165)
34. Heckler & Koch HK33, 5.56cal machinegun bearing SN# 0104 (Nforce 166)
35. Heckler & Koch UMP45, .45cal machinegun bearing SN# 163-001598 (Nforce 167)
36. Colt M16A1, 5.56cal machinegun bearing SN# 5205000 (Nforce 168)
37. H&K HK243, .223cal machinegun bearing SN# 247-001101 (Nforce 169)
38. Heckler & Koch 417, 7.62cal machinegun bearing SN# 89-001687 (Nforce 170)
39. Heckler & Koch 417, 7.62cal machinegun bearing SN# 89-002478 (Nforce 171)
40. FN FAL, 7.62cal rifle bearing SN# 704074 (Nforce 172)
41. Heckler & Koch MR308, .308cal rifle bearing SN# 144-007735 (Nforce 173)
42. Heckler & Koch 417, 7.62cal machinegun bearing SN# 89-001324 (Nforce 174)
43. FN FAL, 7.62cal rifle bearing SN# 113452 (Nforce 175)

44. Heckler & Koch 417, 7.62cal machinegun bearing SN# 89-001710 (Nforce 176)
45. FN F2000, 5.56cal machinegun bearing SN# 049843 (Nforce 177)
46. FN LG1, 40mm launcher bearing SN# 005504 (Nforce 178)
47. B&T AG APC9, 9mm machinegun bearing SN# US20-1702 (Nforce 179)
48. B&T AG APC9, 9mm machinegun bearing SN# US20-1703 (Nforce 180)
49. B&T AG APC9, 9mm machinegun bearing SN# US20-1704 (Nforce 181)
50. B&T AG APC9K, 9mm machinegun bearing SN# US20-1724 (Nforce 182)
51. B&T AG APC9K, 9mm machinegun bearing SN# US20-1723 (Nforce 183)
52. Steyr Aug, 5.56cal machinegun bearing SN# 3083849 (Nforce 184)
53. Steyr Aug, 5.56cal machinegun bearing SN# 3066999 (Nforce 185)
54. Glock Inc 18C, 9mm machinegun bearing SN# BMRU962 (Nforce 186)
55. Glock Inc 18C, 9mm machinegun bearing SN# BMRU965 (Nforce 187)
56. CAI AK47, 7.62cal machinegun bearing SN# RB11455 (Nforce 188)
57. IO Inc Sporter, 7.62cal machinegun bearing SN# F42458 (Nforce 189)
58. Swiss Arms AG, SG 751 rifle bearing SN# R00870 (Nforce 196)
59. Glock GMBH 18, 9mm machinegun bearing SN# YYK029 (Nforce 220)
60. Glock GMBH 18C, 9mm machinegun bearing SN# BLWU989 (Nforce 222)
61. Glock Inc 18, 9mm machinegun bearing SN# YYK028 (Nforce 225)
62. Glock Inc 18, 9mm machinegun bearing SN# YYK021 (Nforce 226)
63. Glock Inc 18C, 9mm machinegun bearing SN# BLWU988 (Nforce 227)
64. Glock Inc 18C, 9mm machinegun bearing SN# YFV819 (Nforce 228)
65. B&T AG GL-06, 40mm launcher bearing SN# US18-28655x (Nforce 233)
66. CZ VZ 61A1, 7.65cal machinegun bearing SN# B1898 (Nforce 234)
67. B&T AG SD Silencer, bearing SN# US20-70807 (Nforce 241)

68. T. Barker, short-barreled 20 gauge shotgun bearing SN# 920 (Nforce 242)
69. B&T AG TP380, .380cal rifle bearing SN# SS09041985US (Nforce 244)
70. H&K MP5SD, 9mm machinegun bearing SN# 5235 (Nforce 247)
71. Sig Sauer SG553-1, 5.56cal machinegun bearing SN# 2863 (Nforce 249)
72. Sig Sauer PE, 5.56cal machinegun bearing SN# 9652 (Nforce 250)
73. Sig Sauer 550-1, 5.56cal machinegun bearing SN# 183531 (Nforce 252)
74. H&K MR308, .308cal rifle bearing SN# 144-007633 (Nforce 253)
75. Sig Sauer 553R, 5.56cal machinegun bearing SN# 181155 (Nforce 254)
76. B&T AG APC9SD, 9mm machinegun bearing SN# US19-28054 (Nforce 255)
77. Sig Sauer SG 550, (STG90) 5.56cal machinegun bearing SN # A2116346 (Nforce 256)
78. B&T AG APC9K, 9mm machinegun bearing SN# US20-10358a (Nforce 257)
79. B&T AG APC45SD, .45cal machinegun bearing SN# US18-21393 (Nforce 258)
80. B&T AG APC9K, 9mm machinegun bearing SN# US20-10359a (Nforce 259)
81. B&T AG APC45, .45cal machinegun bearing SN# US18-22139 (Nforce 260)
82. Sig Sauer SG553, .223cal machinegun bearing SN# 152625 (Nforce 261)
83. H&K MP5K, 9mm machinegun bearing SN# 64-33626 (Nforce 262)
84. B&T AG APC9K, 9mm machinegun bearing SN# US20-10360a (Nforce 263)
85. B&T AG APC9K, 9mm machinegun bearing SN# US20-10356a (Nforce 264)
86. H&K HK417, 7.62cal machinegun bearing SN# 89-001392 (Nforce 265)
87. B&T AG APC9K, 9mm machinegun bearing SN# US20-10357a (Nforce 266)
88. B&T AG APC9SD, 9mm machinegun bearing SN# US18-25032 (Nforce 267)
89. B&T AG APC9SD, 9mm machinegun bearing SN# US16-20859 (Nforce 268)
90. Denel Land Systems LM6, 5.56cal rifle bearing SN# L00634 (Nforce 943)
91. Denel Land Systems LM6, 5.56cal rifle bearing SN# L00857 (Nforce 944)

- 92. Denel Land Systems RI, 7.62cal machinegun bearing SN# 240783 (Nforce 945)
- 93. Denel Land Systems RI Para, 7.62cal machinegun bearing SN# 329529 (Nforce 946)
- 94. B&T AG APC-40, .40cal machinegun bearing SN# US19-33205 (Nforce 947)
- 95. B&T AG APC-9 SD, 9mm machinegun bearing SN# US18-28045 (Nforce 948)
- 96. B&T AG APC-9K, 9mm machinegun bearing SN# US19-29880 (Nforce 949)

All pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Dated: July 25, 2025

Kelly O. Hayes / GAM
Kelly O. Hayes
United States Attorney